

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ADEN HAILE-SHIREGA, )  
                          )  
Plaintiff,            )  
                          ) Civil Action No. 05-978 (RBW)  
v.                     )  
                          )  
DISTRICT OF COLUMBIA, *et al.*,    )  
                          )  
Defendants.            )  
                          )  
\_\_\_\_\_

**CONSENT MOTION FOR ENLARGEMENT OF TIME TO RESPOND  
TO THE COMPLAINT**

Defendants District of Columbia, Officer Nikeith Goins and Sgt. Joseph Massey through counsel, hereby move the court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an enlargement of time until September 26, 2005 within which to respond to the complaint. In support of this motion, defendants rely upon the attached memorandum of points and authorities of law.

Respectfully submitted,

ROBERT J. SPAGNOLETTI  
Attorney General for the District of Columbia

GEORGE C. VALENTINE  
Deputy Attorney General  
Civil Litigation Division

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DAVID A. JACKSON (471535)  
Assistant Attorney General  
Acting Chief, General Litigation II

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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF DEFENDANTS'  
MOTION FOR AN ENLARGEMENT OF TIME TO RESPOND TO THE COMPLAINT**

1. Plaintiff's complaint alleges *inter alia* that she were assaulted, battered and falsely arrested by two officers of the Metropolitan Police Department. The two officers as well as the District of Columbia have been named as defendants.
2. The District of Columbia's response to the complaint is due on August 24, 2005..
3. The Office of the Attorney General for the District of Columbia which represents the District of Columbia requires additional time to ascertain whether it is appropriate for it to also represent the two police officers. Additional time is also required to investigate plaintiff's allegations before an appropriate response can be filed.
4. Defendants believe that a response to the complaint can be filed by September 26, 2005.
5. Plaintiff has consented to this motion

Wherefore, defendants pray that their motion be granted and that the time for them to respond to the complaint be enlarged until September 26, 2005..

Respectfully submitted,

ROBERT J. SPAGNOLETTI  
Attorney General for the District of Columbia

GEORGE C. VALENTINE  
Deputy Attorney General  
Civil Litigation Division

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/s/  
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/s/  
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